

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

_____)	
SHELL OIL COMPANY, ATLANTIC)	
RICHFIELD COMPANY, TEXACO INC., and)	
UNION OIL COMPANY OF CALIFORNIA,)	
)	
Plaintiffs,)	
)	
v.)	Consol. Ct. No. 06-141C
)	(Judge Braden)
UNITED STATES,)	
)	
Defendant.)	
_____)	

DEFENDANT'S UNOPPOSED MOTION FOR LEAVE TO FILE APPENDIX ON DVD

Defendant, the United States, respectfully requests leave to file the appendix to its response to plaintiffs' motion for protective order and partial summary judgment and cross-motion for partial summary judgment utilizing a Digital Versatile Disc (DVD). This case is designated an electronic filing case pursuant to the Court's CM/ECF system. Our appendix contains 73 exhibits, a number of which individually exceed the four megabyte size limitation of electronic files. Plaintiffs consent to this motion.

Filing on a DVD provides the most efficient method for submission of the voluminous sealed appendix in this case. We will, however, deliver paper courtesy copies to the Court by May 19, 2015.

For these reasons, defendant respectfully requests that this motion for leave to file on DVD be granted.

Respectfully Submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

ROBERT E. KIRSCHMAN, JR.
Director

/s/ FRANKLIN E. WHITE, JR.
Assistant Director

/s/ STEPHEN C. TOSINI
Senior Trial Counsel
Department of Justice
Civil Division
Commercial Litigation Branch
PO Box 480
Ben Franklin Station
Washington, DC 20044
Tel: (202) 616-5196
stephen.tosini@usdoj.gov

May 15, 2015

Counsel for Defendant

CERTIFICATE OF FILING

I hereby certify that on the 15 day of May 2015, a copy of the foregoing
“DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE APPENDIX ON DVD” was
filed electronically. I understand that notice of this filing will be sent to all parties by operation
of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

/s/ Stephen C. Tosini